

1 STEVEN F. GRUEL (CSBN 213148)
2 315 Montgomery Street, 10th Floor
3 San Francisco, California 94104
4 Telephone Number (415) 533-6973
attystevengruel@sbcglobal.net
www.gruelaw.com

5 Attorney for Defendant KEN HONG WONG
6
7
8

9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FTANCISCO VENUE

12 UNITED STATES OF AMERICA,

Case No. CR-23-0162-WHO

13 Plaintiff,

**DECLARATION OF
STEVEN F. GRUEL**

14 v.
15
16 KEN HONG WONG,
17 Defendant.

DECLARATION OF STEVEN F. GRUEL

I, Steven F. Gruel, under penalty of perjury, declare and state as follows:

1. I am an attorney in good standing with the California State Bar. I represent defendant
Ken Hong Wong in this case.

2. I served as an Assistant United States Attorney in the Northern District of California from
1989 to 2005. As a federal prosecutor I was involved in countless investigations with state and
federal law enforcement which utilized the cooperation, information and participation of
confidential informants.

3. Ken Wong was first approached by the investigating officers in this case on October 21,

1 2020. It is my understanding that Ken Wong immediately admitted the actions in acting as the
2 conduit of bribe money from someone seeking a job from Mohammed Nuru at the PDW. Ken
3 Wong also agreed to cooperate with the FBI in this investigation. When Ken Wong later
4 asked me to represent him in this matter, I instructed him to keep a log of the days he would
5 meet with or be contacted by the FBI agents. It is my understanding that Ken Wong had
6 approximately 70 meetings with the FBI agents regarding this case and other FBI
7 investigations or matters of interest.

9 4. I learned that Ken Wong voluntary performs as a singer with a group that provides
10 concerts for charitable events raising money for Children's Hospital and other worthy causes.

12 Some recent charitable concerts were:

13 a) on 09-04-2021 - Ken Wong helped raise funds for the Children's Hospital Cancer Center,
14 Seattle;

15 b) on 09-10-2021 | Ken Wing helped raise funds for the UCSF Children's Hospital Cancer
16 Center;

18 c) 01-29-2023 | Ken Wong helped raised \$17,000.00 to help fund the Chinese Hospital Patient
19 Service

20 d) 03-03-2023 | Ken Wong helped raise \$28,000.00 in Vancouver, Canada to help fund for the
21 Children's Hospital Cancer Center

23 e) 03-05-2022 | Raised \$20,000.00 to help the Oakland Police Dept. Safety Program

24 f) 05-05-2023 | Raised funds for the Children's Hospital Cancer Center in Calgary, Canada

25 g) 05-06-2023 | Raised funds for the Children's Hospital Cancer Center in Edmonton, Canada

26 h) more concerts are scheduled for December 23, 2023 in San Jose; February 10, 2024 in
27 Fremont and March 8, 2024 in Fremont.
28

1
2 4. Attached hereto as Exhibit A is a true and correct copy of Ken Wong's letter to the Court
3 pertaining to this matter.
4

5 5. Attached hereto as Exhibit B is a true and correct copy of Kingman K. Wong's letter to
6 the Court regarding Ken Wong. Kingman Wong is a retired FBI Special Agent who served in
7 San Francisco where he conducted investigations into Asian Organized Crime. Mr. Wong is a
8 highly accomplished FBI Special Agent who was also The Special Agent in Charge in New York
9 City, and was assigned to the FBI Headquarter in Washington, D.C. The first assignment he was
10 the unit chief for the Asian and African Criminal Enterprise Unit, overseeing the FBI's
11 investigations against Asian and African organized crime groups in the United States. The
12 second time Mr. Wong was the FBI HQ Section Chief for the International Operations Division,
13 overseeing all of the FBI's Legal Attache offices throughout the world. Kingman Wong has also
14 been an instructor at the FBI Training Facility at Quantico, Virginia as well as working as a part-
15 time professor at Georgetown University.
16
17

18 Also attached is a true and correct copy of FBI Director Louis J. Freeh's Certificate of
19 Recognition to Ken Wong for his outstanding assistance to the FBI in the investigative work
20 described in Kingmon Wong's letter.
21

22 6. Attached as Exhibit C is a true and correct copies of numerous certificates for recognizing
23 Ken Wong's extensive volunteer work for numerous charities. A letter by Mona P.P. Louey is
24 submitted describing Ken Wong's numerous performances at charity concerts raising money for
25 cancer research for UCSF Children Cancer Center, several Children's Hospitals and for the
26 Oakland Police Department's Community Policing Division. Included in Exhibit C are also
27
28

1 numerous Certificates of Recognition and Appreciation by California State Treasurer and the
2 American Red Cross for Ken Wong's volunteer work for the community.

3 7. Attached hereto as Exhibit D is a true and correct copies of numerous letters submitted by
4 friends and family in support of Ken Wong. Fiona Ma, as a private citizen, offers her letter of
5 support for Ken Wong. Ken's wife, sons, and other community members submit letters for the
6 Court's consideration supporting Kew Wong at sentencing.

8 8. Attached as Exhibit E are true and correct copies of numerous awards received over his
9 career as a California State Parole Officer. These awards include a Medal Of Valor, Award of
10 Distinction, The Distinguished Service Award, American Police Hall of Fame, and the John
11 Edgar Hoover Memorial Gold Medal Distinguished Public Service. Also included in Exhibit E
12 are copies of awards for his law enforcement work as recognized by former San Francisco
13 District Attorney Kamala Harris and by undersigned counsel as a Assistant United States
14 Attorney for Ken Wong's work in large investigations and prosecutions against human
15 trafficking.

18 9. Attached as Exhibit F are true and correct copies of other law enforcement awards and
19 certificates of recognition for Ken Wong's success and dedication as a California State Parole
20 Officer.

21 10. Attached as Exhibit G are true and correct copies of numerous Certificates of Honor from
22 former San Francisco Mayors Willie Brown, Gavin Newson and Edwin Lee from 2001 to 2013.

24 11. Attached as Exhibit H are true and correct copies of Congresswoman Nancy
25 Pelosi's *Certificate of Special Congressional Recognition*, former Congresswoman Jackie

1 Speier's *Certificate of Recognition* and former California Assemblyman Mark Leno's *Certificate*
2 *of Recognition* all presented to Ken Wong for his outstanding leadership and dedication to
3 community service.

4
5 12. Attached as Exhibit I are true and correct copies of numerous Certificates of Honors
6 issued and authorized by the Board of Supervisors for the City and County of San Francisco
7 from 2005 to 2018 honoring Ken Wong's continued volunteer efforts dedicated to the betterment
8 and beautification of San Francisco as well as Certificates of Appreciation to Ken Wong by
9 former San Francisco Police Chief Fred Lau.

10
11 I declare under penalty of perjury under the laws of the United States that the foregoing is
12 true and correct, and that this declaration is executed this 24th day of November 2023, in San
13 Francisco, California.

14 Dated: November 24, 2023

15 /s/ Steven F. Gruel
STEVEN F. GRUEL